

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

ZACHARY VERDELL NORTHERN

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 18 U.S.C. §§ 922(g)(1),  
922(g)(9), 924(a)(2), 924(d), and 2; and  
28 U.S.C. § 2461(c)

**COUNT ONE**

**Possession of a Firearm by a Convicted Felon**

The Grand Jury Charges:

On or about October 15, 2018, in the District of North Dakota,

ZACHARY VERDELL NORTHERN,

knowing that he had previously been convicted in any court of a crime punishable by  
imprisonment for a term exceeding one year, to wit:

- (1) Delivery of a Controlled Substance, in violation of 720 ILCS 570/401, a Class 2 felony, State of Illinois, Cook County, Case No. 02-CR-2720201, on or about February 3, 2003;
- (2) Deface Firearm ID Markings, in violation of 720 ILCS 5/24-5(A)(1), a Class 2 felony, State of Illinois, Cook County, Case No. 03-CR-2526001, on or about June 21, 2004;
- (3) Possession of a Controlled Substance, in violation of 720 ILCS 570/402(C), a Class 4 felony, State of Illinois, Cook County, Case No. 03-CR-2672201, on or about February 26, 2004;
- (4) Felon in Possession of a Firearm, in violation of 720 ILCS 5/24-1.1(a), a Class 2 felony, State of Illinois, Cook County, Case No. 05-CR-1214501, on or about June 3, 2005;
- (5) Drugs – 3rd Degree Sale, in violation of Minn. Stat. § 152.023.1(1), a felony, State of Minnesota, Clay County, Case No. 14-CR-07-187, on or about October 4, 2007;

did knowingly possess in and affecting commerce a firearm, that is:

- (1) One Jimenez Arms, J.A. 22, .22 caliber pistol, bearing Serial Number 405591;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

COUNT TWO

**Possession of Ammunition by a Convicted Felon**

The Grand Jury Further Charges:

On or about April 13, 2022, in the District of North Dakota,

ZACHARY VERDELL NORTHERN,

knowing that he had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, to wit:

- (1) Delivery of a Controlled Substance, in violation of 720 ILCS 570/401, a Class 2 felony, State of Illinois, Cook County, Case No. 02-CR-2720201, on or about February 3, 2003;
- (2) Deface Firearm ID Markings, in violation of 720 ILCS 5/24-5(A)(1), a Class 2 felony, State of Illinois, Cook County, Case No. 03-CR-2526001, on or about June 21, 2004;
- (3) Possession of a Controlled Substance, in violation of 720 ILCS 570/402(C), a Class 4 felony, State of Illinois, Cook County, Case No. 03-CR-2672201, on or about February 26, 2004;
- (4) Felon in Possession of a Firearm, in violation of 720 ILCS 5/24-1.1(a), a Class 2 felony, State of Illinois, Cook County, Case No. 05-CR-1214501, on or about June 3, 2005;
- (5) Drugs – 3rd Degree Sale, in violation of Minn. Stat. § 152.023.1(1), a felony, State of Minnesota, Clay County, Case No. 14-CR-07-187, on or about October 4, 2007;

did knowingly possess in and affecting commerce ammunition, that is:

- (1) One round, Federal-manufactured 9mm ammunition;
- (2) One round, Sig-manufactured 9mm ammunition;
- (3) 40 rounds, Eley-manufactured .22 caliber ammunition;
- (4) 49 rounds, Federal-manufactured .22 caliber ammunition; and
- (5) 43 rounds, Winchester-manufactured .22 caliber ammunition;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

COUNT THREE

**Possession of Ammunition by a Person Convicted of Domestic Violence**

The Grand Jury Further Charges:

On or about April 13, 2022, in the District of North Dakota,

ZACHARY VERDELL NORTHERN,

knowing that he had previously been convicted in any court of a misdemeanor crime of domestic violence, to wit:

- (1) Assault – Domestic Violence, in violation of N.D.C.C. § 12.1-17-01.1(1), a Class A misdemeanor, State of North Dakota, East Central Judicial District, Cass County, Case No. 09-2018-CR-5218, on or about May 28, 2019;

did knowingly possess in and affecting commerce ammunition, that is:

- (1) One round, Federal-manufactured 9mm ammunition;
- (2) One round, Sig-manufactured 9mm ammunition;
- (3) 40 rounds, Eley-manufactured .22 caliber ammunition;
- (4) 49 rounds, Federal-manufactured .22 caliber ammunition; and
- (5) 43 rounds, Winchester-manufactured .22 caliber ammunition;

In violation of Title 18, United States Code, Sections 922(g)(9), 924(a)(2), and 2.

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of the offenses alleged in this Indictment,

ZACHARY VERDELL NORTHERN

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offenses, including, but not limited to, the following:

- (1) One Jimenez Arms, J.A. 22, .22 caliber pistol, Serial Number 405591;
- (2) One round, Federal-manufactured 9mm ammunition;
- (3) One round, Sig-manufactured 9mm ammunition;
- (4) 40 rounds, Eley-manufactured .22 caliber ammunition;
- (5) 49 rounds, Federal-manufactured .22 caliber ammunition; and
- (6) 43 rounds, Winchester-manufactured .22 caliber ammunition

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Mac Schneider

MAC SCHNEIDER

United States Attorney